

North American Numbering Council
c/o Columbia Institute for Tele-Information
Columbia Business School
1A Uris Hall
3022 Broadway
New York, NY 10027-6902

July 25, 2005

Mr. Thomas J. Navin
Chief, Wireline Competition Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

RE: Request for FCC Endorsement of LNPA N-1 Architecture Recommendation

Dear Mr. Navin:

The purpose of this letter is to urge the Commission to endorse a recommendation made by the NANC's Local Number Portability Administration Working Group (LNPA WG) for determining which service provider is responsible for querying number portability databases, particularly with respect to Extended Area Service (EAS) calls. Such an endorsement should eliminate or at least substantially mitigate confusion and disputes over this responsibility.

The recommendations were made by the LNPA WG in January, partly in response to a request from the Bureau's staff for the NANC's advice on this matter. Unfortunately, due to a clerical error on my part I have not forwarded the recommendations until today. I apologize for the delay.

As background, a carrier involved in establishing a telephone connection must query a local number portability database to determine which carrier is responsible for finally terminating the call to the ported or pooled telephone number being called. Typically, the carrier before the final terminating carrier (the so-called "N-1 carrier") is responsible for making the database query. As an example, for a local call the originating carrier is also the N-1 carrier and is responsible for performing the query in its network or contracting with another entity to perform the queries on its behalf. Similarly, for interLATA toll calls the interexchange carrier is the N-1 carrier and is responsible for performing the necessary query.

The LNPA WG had been working on extensive guidelines for the overall N-1 Architecture when the Commission staff specifically requested the NANC to review the N-1 process for Extended Area Service (EAS) calls. The LNPA WG's full report, which is attached for your information, was forwarded to telecommunications service operators by the trade associations represented on the NANC.

With respect to EAS, the LNPA WG's recommendation, included on page 11 of the full report, is as follows:

- *On intraLATA calls to EAS codes, the originating carrier is the N-1 carrier and is responsible for the query on all calls to portable EAS codes.*
- *In cases where the originating carrier's switch supports the function to route interLATA EAS calls to ported numbers as a local call via an interLATA LRN, and trunking to all potential final destinations (or their POIs in the EAS area) have been established, the query will be performed in the originating switch.*
- *On interLATA calls to EAS codes where the originating carrier does not support the function to route the call as a local call to ported numbers via an interLATA LRN, the donor carrier in the terminating LATA performs the role of the N-1 carrier (i.e does the database dip and routes the call to the switch serving the ported number). In this instance, the donor carrier will perform the LNP query in the terminating LATA in either that carrier's donor end office or terminating LATA tandem, whichever terminates trunks from the originating LATA on calls to EAS codes. (Note that the terminating LATA tandem case is only applicable if the donor carrier has a tandem in the terminating LATA, and all switches in the originating LATA that can place local calls to the EAS codes in the terminating LATA have trunking to the tandem in the terminating LATA per mutually accepted interconnect agreements.) The originating carrier is responsible for compensation to the donor carrier for performing the N-1 database dip function.*

The donor carrier in the terminating LATA may charge the originating carrier for transit (consisting of transport and switching) of the call.

This language takes into account current technical limitations and regulatory constraints as well as existing configuration issues. Carriers may consider making modifications to their querying and routing arrangements as technology upgrades and changes to interconnecting configurations permit.

To minimize problems and disputes with respect to database query responsibilities, I recommend, on the NANC's behalf, that the Commission endorse all of the LNPA WG's recommendations (particularly the EAS proposals) and, as quickly as possible, take any other steps that may be necessary to encourage service providers to abide by them.

Please feel free to contact me if you or members of your staff have any questions.

Sincerely,

/Signed/

Robert C. Atkinson
NANC Chair

Attachment

cc: Regina Brown, FCC
Marilyn Jones, FCC
Lisa Gelb, FCC
Narda Jones, FCC
Cheryl Callahan, FCC
NANC Members